



Florida Department of Agriculture & Consumer Services  
CHARLES H. BRONSON, Commissioner

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December 10, 2002

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852

Subject: Guidance on Bulk Transport of Juice Concentrates and  
Certain Shelf Stable Juices

Dear Dockets Management:

The Florida Department of Agriculture and Consumer Services (FDACS), Division of Food Safety, commends the Food and Drug Administration's efforts in the publishing of this draft guidance document. However, due to the heightened awareness of food safety/food security concerns, the guidance document should be more specific on the requirements for deviation from 120.24(a &c) of the Juice HACCP Regulation. The Department respectfully submits the following comments and suggestions on this draft guidance document:

- Require tankers that carry food be sealed with tamper proof seals when loaded and after cleaning and sanitizing.
- Require tankers that carry food product to be licensed to ensure accountability in operations that only food grade products are hauled and for assistance in trace back activity.
- Require tankers that transport juice products to show certification of product transported for a minimum of the 3 previous loads.
- Require tankers to be washed, rinsed, and sanitized at a certified food grade washing station. Tanker operator must maintain documentation to support accomplishment.
- Require the implementation of specific verification activities, including microbiological analysis of the tanker food contact surfaces, on a routine basis to ensure the cleaning system is performing.
- Establish specific procedures outlining the tanker driver's responsibility including, but not limited to, employee health, food contact surfaces, cross contamination and other food safety issues.

02P-0009

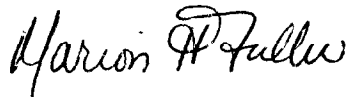
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- Expand the discussion regarding critical limits, control strategies, monitoring mechanisms, corrective actions, and verification. The expanded discussion would be helpful for both the regulatory and industry use of this document.
- For compliance purposes, the expectations of the commodity trucking industry should be no less stringent than that required for the Dairy Industry - with an added awareness that these products may be ready-to-eat and not receive additional thermal processing.

The Florida Department of Agriculture and Consumer Services appreciates the opportunity to comment on this document and applauds the effort that was put forth in providing useful guidance for industry for compliance with the Juice HACCP Regulation.

Sincerely,

**CHARLES H. BRONSON**  
**COMMISSIONER OF AGRICULTURE**



Marion H. Fuller, DVM, DABT  
Director, Division of Food Safety

MHF:bc

cc: Dr. Martha Roberts  
Dr. John Fruin